

## REMARKS AND COMMENTS

The Examiner has objected to displayed text for cancelled claims 2, 6, 8, and 12-13. The text for these cancelled claims is no longer presented.

The Examiner has rejected claim 1 under 35 U.S.C. 103(a) as being unpatentable over Matsuzaki et al. (US 2003/0189929) in view of Peloquin et al. (US 6,449,705). The Examiner states that Matsuzaki does not disclose the use of granularity as a policy. The Examiner further states that Peloquin discloses “the general concept of using a policy of granularity in creating zones”. Applicants respectfully disagree with this assertion. In the Abstract, Peloquin states “Each logical volume is divided into a plurality of zones, wherein the zones for a particular logical volume are **substantially equal in size.**” Furthermore Peloquin states (col. 6, line 15-17) that “The size of a zone is a power of 2, and **every zone is the same size** (except the last one, which is allowed to be smaller).” Thus Peloquin actually teaches away from using granularity as a practice or policy. Accordingly, it would not have been obvious to one of ordinary skill in the art to combine Matsuzaki and Peloquin for using granularity as a zoning policy.

The Examiner has rejected claims 3-5 under 35 U.S.C. 103(a) as being unpatentable over Matsuzaki and Peloquin, and further in view of Tawil (US2002/0103913). Claims 3-5 are dependent on claim 1. For the reasons above Applicants believe that claim 1 is allowable and therefore claims 3-5 are allowable. The Examiner has stated “The general concept of zones controlling network visibility between devices is well-know in the art as taught by Tawil. (See[0010], ‘Devices in the same zone can see each other but devices in different zones cannot see each other.’”

Applicants respectfully point out that in the present invention a zone plan dictates which of the devices are visible to each other. Thus a zone plan according to the present invention may have considerably more refinement than rigidly restricting visibility within or between zones. Applicants respectfully suggest that “the general concept of zones controlling network visibility” as taught by Tawil in combination with Matsuzaki and Peloquin would not have been obvious to one of ordinary skill in the art.

The Examiner has rejected claims 3-5 and 9-11 under 35 U.S.C. 103(a) as being unpatentable over Hsieh and Peloquin as applied to claims 1 and 7 above and further in view of Tawil. The Examiner states that “Hsieh and Peloquin teach all the limitations of claims 3-5 and 9-11 except for a zone dictating which devices are visible to each other, or being a network-layer access control mechanism that dictates which storage subsystems are visible to each other”. Applicants respectfully traverse Examiner’s full reasons for this assertion. On the last point, as stated above, Tawil does not teach a zone plan that selectively dictates which of the devices are visible to each other. Accordingly, Applicants believe that the combination of Hsieh, Peloquin, and Tawil does not teach the present invention to one of ordinary skill in the art.

## CONCLUSION

For the above reasons, Applicants submit that the pending claims 1, 3-5, 7, and 9-11 are patentable over the prior art. Applicants respectfully request reconsideration.

Respectfully submitted,

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